

November 2, 2020

Via CM/ECF

Honorable Lewis J. Liman  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 701  
New York, NY 10007

**Re: *Culbertson et al. v. Deloitte Consulting LLP*, No. 1:20-cv-03962-LJL  
Consolidated with  
Case No. 1:20-cv-04129-LJL  
Case No. 1:20-cv-04077-LJL  
Case No. 1:20-cv-04362-LJL  
Case No. 1:20-cv-05070-LJL**

Dear Judge Liman:

We write on behalf of Defendant Deloitte Consulting LLP (“Deloitte”) in the above-captioned cases to further update the Court as to the status of the related action filed against Deloitte in the Northern District of Illinois, *Karns v. Deloitte Consulting LLP*, Case No. 1:20-cv-04952 (N.D. Ill., filed Aug. 24, 2020).

As previously explained in Deloitte’s October 9, 2020 letter to the Court (ECF No. 85), Deloitte filed a Motion to Transfer the *Karns* action to this court on October 8, 2020. In lieu of opposing Deloitte’s Motion to Transfer, Plaintiff Karns agreed to execute a joint stipulation consenting to the transfer of her action to this Court. On October 30, 2020, the Honorable Judge John Robert Blakey entered an Order to transfer the *Karns* action to this Court; a courtesy copy is attached hereto.

Additionally, Deloitte informed Plaintiff Karns that it intends to file a Motion to Dismiss the *Karns* complaint. Deloitte anticipates that its forthcoming Motion to Dismiss the *Karns* complaint will largely incorporate by reference the arguments made in its previously filed Motion to Dismiss Plaintiffs’ Amended Consolidated Complaint in the instant actions (ECF No. 88), and that Deloitte will only address any unique claims and allegations in the *Karns* complaint. Accordingly, counsel for Plaintiff Karns and Deloitte have conferred and agreed to extend Deloitte’s deadline to move to dismiss the *Karns* Complaint **through and including November 13, 2020**.

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Thank you for the Court's attention and consideration of this update.

Respectfully submitted,

/s/ Phyllis B. Sumner

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cc: All counsel of record (via ECF)